

JMR-MTS/2013R01283

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14- 148 (JHR)
v. :
ALVIN MATTHEWS : 18 U.S.C. §§ 1958, 924(c), 922(g)(1),
and 2

INFORMATION

The defendant having waived in open court prosecution by indictment,
the United States Attorney for the District of New Jersey charges:

COUNT 1
[18 U.S.C. § 1958 – Conspiracy to Commit Murder for Hire]

The Defendant and Other Individuals

1. At all times relevant to this Information:
 - a. Individual #1, who is named as a co-conspirator but not as a defendant herein, was a resident of Philadelphia, Pennsylvania, and owned and operated Business #1 located in Philadelphia, Pennsylvania.
 - b. Individual #2, who is named as a co-conspirator but not as a defendant herein, was a resident of Philadelphia, Pennsylvania, and at various times worked for Individual #1.
 - c. R.W., who is named as a co-conspirator but not as a defendant herein, was a resident of Philadelphia, Pennsylvania, and at various times worked for Individuals #1 and #2.
 - d. Defendant ALVIN MATTHEWS was a resident of Brookhaven, Pennsylvania, and at various times worked for Individuals #1 and #2.

e. Victim #1 was a resident of Atlantic City, New Jersey, and also maintained a home in Philadelphia, Pennsylvania.

The Conspiracy

2. On or about November 30, 2013, in the District of New Jersey and elsewhere, defendant

ALVIN MATTHEWS

conspired and agreed with Individual #1, Individual #2, R.W. and others to travel in, and cause another to travel in, interstate commerce, that is from Philadelphia, Pennsylvania to Atlantic City, New Jersey, and to use, and cause another to use, an interstate facility, that is, a telephone, with intent that a murder be committed, in violation of the laws of the State of New Jersey, that is, New Jersey Statutes Annotated, Section 2C:11-3, as consideration for the receipt of something of pecuniary value, that is, United States currency, and as consideration for a promise and agreement to pay money, the result of which Victim #1 suffered personal injury.

Manner and Means

3. It was part of the conspiracy that Individual #1 directed R.W. and defendant ALVIN MATTHEWS to murder Victim #1 in consideration for Individual #1's agreement and promise to pay R.W. and MATTHEWS in cash for doing so.

Overt Acts

In furtherance of the conspiracy and to effect its object, defendant ALVIN MATTHEWS and others committed the following overt acts, among others, in

the District of New Jersey and the Eastern District of Pennsylvania and elsewhere:

4. Beginning sometime before June 2013, Individual #1 began saying that he was going to kill Victim #1.

5. In or about June 2013, Individual #1, members of Individual #1's family and associates of Individual #1 had dinner with Victim #1 at a restaurant in Northfield, New Jersey. During dinner, Individual #1 took Victim #1 into the kitchen and threatened to kill him.

6. Individual #1 and Individual #2 approached defendant ALVIN MATTHEWS and R.W. and asked that they kill Victim #1 in a manner that would not implicate Individual #1 in the murder plot.

7. Individual #1 promised to pay defendant ALVIN MATTHEWS and R.W. \$20,000 to shoot and kill Victim #1.

8. Individual #1 provided defendant ALVIN MATTHEWS and R.W. with several addresses associated with Victim #1, including an address in the vicinity of Broad and Snyder Streets in Philadelphia, Pennsylvania and in Atlantic City, New Jersey.

9. On November 15, 2013, in an attempt to find and kill Victim #1, Individual #2 took R.W. and co-conspirator #1 to Victim #1's home in Philadelphia, Pennsylvania. Upon finding the home empty, co-conspirator #1 broke into Victim #1's home and vandalized it while WALKER waited outside

10. On or about November 29, 2013, Individual #2 gave defendant ALVIN MATTHEWS a Colt .25 caliber semi-automatic handgun.

11. On or about November 30, 2013, Individual #2 telephoned defendant ALVIN MATTHEWS and R.W. and arranged to meet them. At some point Individual #1 called Individual #2 on Individual #2's cellular telephone and told Individual #2 that Victim #1 was in New Jersey. Thereafter, Individual #2 drove MATTHEWS and R.W. to Atlantic City, New Jersey.

12. During the drive, Individual #2 told defendant ALVIN MATTHEWS and R.W. that if there was a woman with Victim #1, she was not to be harmed.

13. While in Individual #2's vehicle, defendant ALVIN MATTHEWS gave R.W. the Colt .25 caliber semi-automatic handgun that Individual #2 had given MATTHEWS the day before.

14. Individual #2 then dropped defendant ALVIN MATTHEWS and R.W. off around the corner from Victim #1's home in Atlantic City, New Jersey.

15. When Victim #1 and a woman came out of the home, defendant ALVIN MATTHEWS and R.W. approached them and R.W. shot Victim #1 with the Colt .25 caliber semi-automatic handgun, striking Victim #1 multiple times.

In violation of Title 18, United States Code, Section 1958.

COUNT 2

[18 U.S.C. § 924 –Possession and Use of a Firearm During a Crime of Violence and Aiding and Abetting Thereof]

1. Paragraphs 1 and 3 through 15 of Count 1 of this Information are incorporated as if set forth in full herein.

2. On or about November 30, 2013, in the District of New Jersey and elsewhere, defendant

ALVIN MATTHEWS

did knowingly and willfully use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to use interstate commerce facilities in the commission of a murder-for-hire and use of interstate commerce facilities in the commission of murder-for-hire, contrary to Title 18, United States Code, Section 1958, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNT 3
[18 U.S.C. § 922 – Felon in Possession of a Firearm]

On or about November 30, 2013, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

ALVIN MATTHEWS

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the Commonwealth of Pennsylvania, did knowingly possess, in and affecting commerce, a firearm, namely, one loaded Colt .25 caliber semi-automatic handgun, bearing serial number 304206, and ammunition.

In violation of Title 18, United States Code, Section 922(g)(1); and Title 18, United States Code, Section 2.



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-

United States District Court
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UNITED STATES OF AMERICA

v.

ALVIN MATTHEWS

INFORMATION FOR

18 U.S.C. § 1958

18 U.S.C. § 924

18 U.S.C. § 922

18 U.S.C. § 2

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